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10 Attorneys for Courtney Love Cobain

11
12 IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
13 FOR KING COUNTY
14

15 RICHARD LEE,

16 Plaintiff,

17 vs.

18 CITY OF SEATTLE, SEATTLE POLICE
19 DEPARTMENT and SPD INTERIM CHIEF
20 HARRY BAILEY and SPD DETECTIVE
21 MIKE CIESYNSKI,

22 Defendants.

No.: 14-2-09292-0 SEA

DECLARATION OF COURTNEY LOVE
COBAIN

23 COURTNEY LOVE COBAIN declares and states:

24 1. My name is Courtney Love Cobain. I have personal knowledge of the facts
25 contained within this declaration, and am competent to testify thereto.

26 2. I am the widow of Kurt Cobain, who committed suicide in 1994. Kurt's death
27 was the most traumatic experience of my life. It left me physically distraught, and I continue to
28 suffer emotionally from the loss of my husband to this day.

3. I understand that the Plaintiff seeks the public release of death-scene photos of
Kurt that show his entire lifeless body, as well as the damage done by the shotgun blast to his
head. I have never seen these graphic and disturbing images, nor do I ever want to. I cannot

1 believe that there exists any genuine public interest which might be served by the public release
2 of these images. Certainly, public disclosure would reopen all my old wounds, and cause me and
3 my family permanent – indeed, endless and needless – pain and suffering, and would be a gross
4 violation of our privacy interests.

5 4. Inevitably, these images will wind up on the Internet, where they would be
6 permanently disseminated. By virtue of the fact that Kurt is my late husband, they will also
7 likely end up in search results about myself. I would unavoidably come across them, and I
8 would never be able to erase those haunting images from my mind. I cannot even imagine the
9 enormity of the trauma this would cause me, not to mention many others.

10 5. I am routinely called a murderer and receive death threats by conspiracy-theory
11 obsessed individuals who believe I was somehow involved in my husband's death, and the
12 public release of these images would only exacerbate such activity and further endanger my
13 safety.

14 6. It also sickens me that if released, third parties, like the Plaintiff, will wrongfully
15 profit from exploiting these images.

16 7. Preventing unnecessary disclosure of private information related to Kurt has been
17 my consistent position for over twenty years. In 1995, I successfully attained injunctive relief in
18 the matter *Courtney Love Cobain v. Washington State Patrol*, No. 95-2-27261-4 SEA,
19 preventing the disclosure of private letters Kurt wrote to me shortly before his death.

20 8. I understand that even if this current matter is dismissed on procedural grounds,
21 the Plaintiff might attempt yet another lawsuit. If that happens, I would again intervene like I did
22 in the prior matter and seek injunctive relief.

23
24 I declare under penalty of perjury under the laws of the State of Washington that the
25 foregoing is true and correct.

26 Executed July 20, 2015, in Los Angeles, California.

27
28 
Courtney Love Cobain